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August 10, 2015

*[CORRECTED] VIA ECF*

Honorable Brian M. Cogan  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: *Linde v. Arab Bank, PLC*, 04-CV-2799 (BMC) (VVP), and related cases**

Dear Judge Cogan:

Given the number of motions pending before the Court, Defendant respectfully suggests that an efficient way to address the motions is by Plaintiff group. Attached is a list organized by Plaintiff group. The number at the beginning of each motion on the attached list corresponds to the list earlier provided to chambers. If the Court would prefer some other approach to arguing the motions, please let us know.

We thank the Court for its attention to this matter.

Very truly yours,

**DLA Piper LLP (US)**

/s/  
Shand S. Stephens



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**GENERAL MOTIONS**

- (3) Defendant Arab Bank PLC's Motion *In Limine* On Admissibility Of National Insurance Institute Findings And Disability Ratings (Not Docketed on ECF)
- (4) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Improper Jury Arguments (Not Docketed on ECF)
- (22) Defendant Arab Bank PLC's Primary Motion *In Limine* To Exclude Arguments, Evidence And References (ECF No. 1353)
- (26) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Certain Demonstrative Exhibits (ECF No. 1357)
- (29) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Graphic And Unfairly Prejudicial Plaintiff Exhibits Pursuant To FRE 401-403 (1358)
- (30) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Improper Questions to Experts (ECF No. 1351)

Plaintiffs' Joint Motions in Limine

**GOLDSTEIN MOTIONS**

- (9) Defendant Arab Bank PLC's Motion *In Limine* To Preclude Plaintiff Barbara Goldstein-Ingardia From Testifying That Her Attention Deficit Disorder Was Caused By The Route 60 Attack (Not Docketed on ECF)
- (10) Defendant Arab Bank PLC's Motion *In Limine* To Preclude Ms. Barbara Goldstein-Ingardia From Testifying That Her Gastrointestinal Problems Were Caused By Stress From The Route 60 Attack (Not Docketed on ECF)
- (11) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Testimony Regarding Expansion Of Plaintiff Barbara Goldstein-Ingardia's House (Not Docketed on ECF)
- (12) Defendant Arab Bank PLC's Motion *In Limine* To Preclude Barbara Goldstein-Ingardia From Testifying That Her Hypothyroidism Was Exacerbated By Stress From The Route 60 Attack (Not Docketed on ECF)



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(14) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Testimony By Michal Honickman And To Bar Admission Into Evidence Ms. Honickman's Memoir "Letters To Tzvi: A Mourner's Diary" (Not Docketed on ECF)

(24) Defendant Arab Bank's Memorandum Of Law In Support Of Its Motion *In Limine* To Exclude Certain Testimony Of Plaintiffs' Proposed Expert Dr. John Borowski (ECF No. 1341)

(27) Defendant Arab Bank's Memorandum Of Law In Support Of Its Motion *In Limine* To Exclude Certain Testimony Of Plaintiffs' Proposed Expert Dr. Joan Difede (ECF No. 1362)

(25) Defendant Arab Bank's Memorandum Of Law In Support Of Its Motion *In Limine* To Exclude Certain Testimony Of Plaintiffs' Proposed Expert Dr. Joseph Burton (ECF No. 1360)

(31) Defendant Arab Bank's Daubert Motion To Exclude Testimony Of Plaintiffs' Proposed Expert Gil Kleiman (ECF No. 1359)

(2) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Testimony By Dudi Binyamin (Not Docketed on ECF)

(34) Defendant Arab Bank's Memorandum Of Law In Support Of Its Motion *In Limine* To Exclude Certain Testimony Of Plaintiffs' Proposed Expert Dr. Alan Rosenberg (ECF No. 1352)

(28) Defendant Arab Bank's Motion *In Limine* To Exclude Testimony From Plaintiffs' Proposed Expert Dr. Matthew Friedman (ECF No. 1355)

(32) Defendant Arab Bank's Memorandum Of Law In Support Of Its Motion *In Limine* To Exclude Certain Testimony Of Plaintiffs' Proposed Expert Dr. Robert Kurtz (ECF No. 1354)

(7) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Testimony On Chana Freedman's Academic Record At Bar-Ilan University (Not Docketed on ECF)



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(8) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Testimony And Other Evidence Regarding Plaintiff Chana Freedman's Prolactin Hormone Level (Not Docketed on ECF)

The Goldstein Plaintiffs' Motion *In Limine* (ECF No. 1296, 1297, 1299)

### **LITLE MOTIONS**

(6) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Testimony Regarding Elishua Litle's Academic Performance (Not Docketed on ECF)

(15) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Testimony Regarding Josiah Litle's Migraine Headaches, Stomach Pains, And Decline In Academic Performance (Not Docketed on ECF)

(19) Defendant Arab Bank PLC's Motion *In Limine* To Preclude Philip Litle From Testifying That His Hypertension Was Caused By The Bus 37 Bombing (Not Docketed on ECF)

(18) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Testimony By Sagi Matza (Not Docketed on ECF)

(13) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Testimony By Alex Haimov (Not Docketed on ECF)

(17) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Testimony Of Shai Lev (Not Docketed on ECF)

The Litle Plaintiffs' Motion *In Limine* (Not Docketed on ECF)

Plaintiffs' Motion *In Limine* To Preclude Certain Cross-Examination Of Dr. Jonathan Arden (Not Docketed on ECF)

### **ELIYAHU MOTIONS**

(1) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Testimony And Other Evidence Regarding Ayelet Attias's Migraine Headaches (Not Docketed on ECF)



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(20) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Testimony And Other Evidence Regarding The Impact Of Tali Eliyahu's Death On Her Father And Mother (Not Docketed on ECF)

(21) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Testimony And Other Evidence Regarding Plaintiff Yehuda Eliyahu's Blood Pressure (Not Docketed on ECF)

Plaintiff Yehuda Eliyahu's Motion *In Limine* To Exclude Specific Lines Of Questioning And Exhibits (ECF No. 1295)

Plaintiff Ayelet Attias' Motion *In Limine* To Exclude Specific Lines Of Questioning And Exhibits (ECF No. 1292)

### **COHEN MOTIONS**

(23) Defendant Arab Bank PLC's Motion *In Limine* To Exclude The Testimony Of Dr. Elisha Bartov (ECF No. 1356)

(33) Defendant Arab Bank PLC's Motion *In Limine* To Exclude The Testimony Of Dr. Avraham Rivkind (ECF No. 1339)

(35) Defendant Arab Bank PLC's Combined Daubert Motion To Exclude Certain Opinions Of Expert Nechama Silberman And Motion *In Limine* To Exclude Testimony Regarding Plaintiff Yossef Cohen (ECF No. 1340)

(16) Defendant Arab Bank PLC's Motion *In Limine* To Exclude Testimony By Avishai Kapach (Not Docketed on ECF)

(5) Defendant Arab Bank PLC's Motion *In Limine* To Exclude The Testimony Of David Edelson (Not Docketed on ECF)

Plaintiff Yossef Cohen's Motion *In Limine* To Exclude Specific Lines Of Questioning And Exhibits (ECF No. 1293)



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**LAHAM (SHAKED) MOTIONS**

Plaintiff Rachel Shaked's Motion *In Limine* To Exclude Specific Lines Of Questioning  
And Exhibits (ECF No. 1294)